Kewpie Group Human Rights Policy

Group Philosophy

We recognize our capacity to impact human rights, both directly and indirectly, at every step in the value chain of our business. The Kewpie Group Human Rights Policy ("this policy") expresses our commitment to respect the human rights of all people our business touches.

Respecting human rights is an essential part of practicing our corporate motto, RAKU-GYOU-KAI-ETSU—the idea that people who have the same ambitions enjoy working together, endure struggles together and rejoice together. We strive to ensure that executives and employees of the Kewpie Group can work with peace of mind, satisfaction and responsibility for ensuring that their actions do not create, or indirectly assist, adverse human rights impacts.

We expect our suppliers and all other business partners to comply with this policy, and we continually engage with them for this purpose.

Scope

This policy applies to all executives and employees (including dispatched employees, part-time and fixed-term workers) of Kewpie Corporation and its subsidiaries (excluding publicly listed companies and their subsidiaries). We also expect suppliers and all other business partners involved in Kewpie products and services to strive to understand and to comply with this policy.

Policy Context and Organization

This policy aligns with the principle of respect for human rights articulated in our Code of Ethics. It guides our commitment to better understand human rights issues related to our business activities and to meet our responsibility to respect human rights. The Kewpie Corporation Board of Directors is responsible for overseeing implementation of this policy.

Endorsement of International Human Rights Standards

We uphold the human rights principles and standards set out in the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work, and use the UN Guiding Principles on Human Rights (UNGPs) as a framework for their implementation. We abide by all human rights laws and regulations in countries and regions where we operate our business.

When local laws contradict or conflict with internationally recognized human rights standards, we follow the more stringent standards and pursue a course of action that is most respectful of

internationally recognized standards.

Due Diligence

We build mechanisms for practicing human rights due diligence in accordance with the UNGPs and use appropriate and effective means to prevent any adverse human rights impacts our business activities may cause.

Corrective Action

Where we have identified adverse human rights impacts caused by or resulting from our business activities, we will take corrective action by providing appropriate remediation. Where our products or services become associated with adverse human rights impacts through a supplier or other business partner, we will urge the business partner to take corrective action.

Education

We carry out education and training to ensure that this policy is effectively integrated and implemented in all areas of our business operations.

Information Disclosure

We disclose the ongoing progress and outcomes of our human rights initiatives through the Kewpie Group website, publications and other communications.

Stakeholder Dialogue

When implementing this policy, we seek the guidance of independent third-party experts and engage our stakeholders in honest dialogue and discussion.

February 25, 2022

Mitsuru Takamiya

Representative Director,

President and Chief Executive Corporate Officer

Kewpie Corporation